



[WWW.RIVKINRADLER.COM](http://WWW.RIVKINRADLER.COM)

926 RXR Plaza  
Uniondale, NY 11556-0926  
T 516.357.3000 F 516.357.3333

**COLLEEN A. O'NEIL**

(516) 357-3390  
[colleen.oneil@rivkin.com](mailto:colleen.oneil@rivkin.com)

October 15, 2020

**VIA ECF**

Honorable Sanket J. Bulsara  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Government Employees Insurance Company, et al. v. Zaitsev, et al.*  
Docket No.: 20-cv-03495-FB-SJB  
RR File No.: 5100-2955

Dear Judge Bulsara:

We represent Plaintiffs Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company, and GEICO Casualty Company (collectively "Plaintiffs") in the above-referenced matter. Pursuant to the Court's October 6, 2020 Scheduling Order (*see* Docket 58), we respectfully submit this letter to explain why the timeline in the parties' attached proposed Discovery Plan Worksheet differs from the timeline suggested by the Court.

In particular, the parties' proposed Discovery Plan Worksheet sets a fourteen and a half month case management schedule. Plaintiffs respectfully request this extended case management schedule because this case involves complex legal issues and 23 defendants, and we thus anticipate that an extended amount of time will be required to complete discovery.

All counsel thus far appearing in this matter have agreed to the extended schedule.

We appreciate the Court's attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

*/s/ Colleen O'Neil*

Colleen O'Neil

cc: All counsel via ECF